

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

IN THE MATTER OF:

CHAPTER 13:

ADRIAN NICHOLE JACKSON

CASE NO. 23-01433 JAW

**TRUSTEE'S OBJECTION TO
DEBTOR'S MOTION TO INCUR DEBT**

COMES NOW, Semoune Ellis on behalf of Torri Parker Martin, the duly appointed and qualified Standing Trustee in the above cause and files this Objection to the Debtor's Motion to Incur New Debt (Docket #47) and in support thereof, would show unto the Court the following:

1. The Debtor is requesting permission from the Court to incur new debt to purchase a vehicle for a financed amount up to \$30,000.00 and a monthly payment not to exceed \$550.00.
2. The Debtor's Motion does not include the financing term or interest rate.
3. The Debtor's confirmed plan proposes paying zero percent (0%) to unsecured creditors over the thirty-six-month plan term (Docket #19). The approved unsecured debt total is \$14,783.67.
4. The Debtor's Schedules I & J have been amended to include the estimated car payment, vehicle insurance, income increase and additional disposable income (Docket #46).
5. The Debtor's amended schedules do not provide documentation regarding the income increase, to include, but not limited to, the Debtor's 2024 tax return, updated pay advices and Social Security Income statement(s).

6. The Trustee believes it is not in the best interest of the bankruptcy estate for the Debtor to incur new debt at the expense of timely filed unsecured creditors.

WHEREFORE, PREMISES CONSIDERED, the Trustee prays that this Objection be received and filed and at the hearing hereon, an Order be entered denying the Motion to Incur Debt, or in the alternative, should the Debtor's Motion to Incur Debt be granted, that the Debtor be required to (1) provide additional information on the vehicle financing terms (2) provide documentation evidencing the income increase and (3) increase distribution to timely filed and allowed unsecured creditors to the sum of \$1,435.59 over the remaining plan term; and any other general relief to which the Trustee and this bankruptcy estate may be entitled.

DATED: June 12, 2025

Respectfully submitted,

/s/ Semoune Ellis

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Standing Chapter Thirteen Trustee
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CERTIFICATE OF SERVICE

I, Semoune Ellis, do hereby certify that I have this day submitted a true and correct copy of the above and foregoing Objection to the following, all by U.S. Mail, postage prepaid, and/or electronic, ECF filing, to: Abigail Marbury, Asst. U. S. Trustee, USTPRegion05.JA.ECF@usdoj.gov, 501 E. Court Street, Suite 6.430, Jackson, MS 39201, and

Attorney for Debtor:

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DATED: June 12, 2025

/s/Semoune Ellis
Semoune Ellis